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**Attorneys for Defendant** 

# IN THE UNITED STATES DISTRICT COURT

### FOR THE DISTRICT OF OREGON

### PORTLAND DIVISION

UNITED STATES OF AMERICA,

Case No. 3:10-cr-00475-KI-1

Plaintiff,

MOTION TO RESCHEDULE ORDER OF HEARINGS

v.

## MOHAMED OSMAN MOHAMUD,

### Defendant.

The defendant, Mohamed Osman Mohamud, through his attorneys, hereby moves this Court for an order rearranging the current schedule of hearings. The current schedule calls for a hearing on non-FISA motion to suppress on April 10, 2012, hearing of FISA motions on April 17, 2012, and hearing on the second motion to compel discovery on May 1, 2012. Based on the change in the

#### PAGE 1 MOTION TO RESCHEDULE ORDER OF HEARINGS

scope of the hearing on the non-FISA motion and the need for additional discovery on suppression

issues, Mr. Mohamud believes that a change in the sequence of the hearings will allow for more

thorough, logical, and complete litigation on the suppression issues. The defense requests that the

Court schedule the hearing on the second motion to compel discovery for April 10, 2012, the hearing

on FISA motion to suppress on April 17, 2012, and the hearing on non-FISA motions to suppress

on May 1, 2012.

Assistant United States Attorney Ethan Knight has been consulted about this and advised that

the government has not yet decided what position it will take.

Respectfully submitted this 2nd day of April, 2012.

/s/ Stephen R. Sady

Stephen R. Sady

Chief Deputy Federal Public Defender

/s/ Steven T. Wax

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Federal Public Defender

/s/ Ellen C. Pitcher

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